

FILED

APR 26 2012

Phil Lombardi, Clerk
U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,)	No.
)	
Plaintiff,)	<u>COMPLAINT</u> 12-mj-120-TLW
)	[Count 1:18 U.S.C. § 1591(a)(2) - Sex
v.)	Trafficking by Force, Fraud and
)	Coercion;
GLORIA N. GIAMMALVA)	Count 2: 18 U.S.C. § 2422(a) -
a/k/a "Diana",)	Coercion and Enticement to Travel
)	in Interstate Commerce to Engage in
Defendant.)	Prostitution]

BEFORE: T. Lane Wilson, United States Magistrate
United States Courthouse, Tulsa, Oklahoma

The undersigned complainant being duly sworn states:

COUNT ONE
[18 U.S.C. § 1591(a)(2)]

On or about January 19, 2012, in the Northern District of Oklahoma and elsewhere, the defendant, **GLORIA N. GIAMMALVA**, a/k/a "Diana", in and affecting interstate and foreign commerce, knowingly benefitted, and attempted to benefit, financially and by receiving something of value from participation in a venture that engaged in recruiting, enticing, harboring, transporting, providing, obtaining and maintaining BC, a female individual whose identity is known to the United States, and other females, both known and unknown, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used and were used to cause BC and other females to engage in commercial sex acts.

All in violation of Title 18, United States Code, Sections 1591(a)(2), 1594(a) and 2(a).

COUNT TWO
[18 U.S.C. § 2422(a)]

Beginning at least as early as March 2011 and continuing until January 2012, in the Northern District of Oklahoma, and elsewhere, the defendant, **GLORIA N. GIAMMALVA**, a/k/a "Diana", knowingly persuaded, induced, enticed and coerced individuals, including BC and others, both known and unknown to the United States, to travel in interstate commerce from other states to Oklahoma, to engage in prostitution and in sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2422(a) and 2(a).

The complainant further states that this Complaint is based on the attached Affidavit.



GARRETT D. HENDRICKSON
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me, this 26th day of April, 2012.



T. LANE WILSON
United States Magistrate Judge

AFFIDAVIT

I, Garrett D. Hendrickson, affiant herein, being duly sworn, state as follows:

I. Agent Background and Experience

Your Affiant states that I am currently employed as a Special Agent with Immigration and Customs Enforcement, Homeland Security Investigations (HSI), and have been so employed since August 2010. I am currently assigned to the office of the Resident Agent in Charge in Tulsa, OK. Prior to my employment with HSI, I was a Captain in the United States Army. Since becoming a Special Agent with HSI, I have conducted investigations of unlawful drug distribution, child pornography, firearm violations, human smuggling, immigration fraud, gang investigations, and sex trafficking and I have participated in physical surveillance, surveillance of undercover transactions, the execution of search warrants, and debriefings of informants, witnesses, suspects, and victims. Through my training, education and experience and through the course of this investigation, I have become familiar with the manner in which sex trafficking organizations operate. I have executed multiple search warrants at locations where prostitution was being conducted and locations where sex trafficking victims have been held. I have conducted over twenty interviews of sex trafficking victims, prostitutes, individuals responsible for overseeing prostitution activities, and individuals responsible for operating prostitution and sex trafficking businesses across multiple states. Your Affiant states that during the course of my training and experience I have learned how individuals involved in sex trafficking and prostitution maintain records, communicate, coordinate movement of sex trafficking victims, conspire to deceive law enforcement, collect money, and distribute proceeds

of illegal prostitution and sex trafficking. Your Affiant states that the information contained in this affidavit is known personally by your Affiant or was learned by your Affiant from other Officers or Agents.

Your Affiant states that through my training and experience, I am familiar with the Federal Criminal Laws and understand violations of Title 18, United States Code, Section 1591(a) and 2(a) – Sex Trafficking by Force, Fraud, and Coercion; Title 18, United States Code, Section 1594(c) – Conspiracy to Engage in Sex Trafficking by Force, Fraud, and Coercion, and Title 18, United States Code, Section 2422 – Coercion and Enticement to Travel in Interstate Commerce to Engage in Prostitution.

II. The Conspiracy – Overview

Your Affiant states that on January 19, 2012, an investigation into a multi-state human trafficking and prostitution ring was initiated. The investigation has shown that Gloria GIAMMALVA (aka: "Diana"), her husband Juan ROSALES-Garza (aka: "Fernando"), and Piedad CURREA-Garcia (aka: "Sor Angeles") were the leaders/organizers of an international and multi-state sex trafficking venture. They used male illegal aliens as workers, known as "caretakers", who maintained and operated apartments and houses as brothels. The caretakers harbored women in the brothels who participated in commercial sex acts. Your Affiant states that some of the women were forced to participate in commercial sex acts while others participated voluntarily. The women who were forced to participate did not, generally, have the freedom to leave the apartment, could not stop working at any time they wished, and had certain rules by which they must abide. If the involuntary female workers broke a rule, money or food was withheld from them. Workers who were called "transporters" would transport the involuntary female workers from one state to another for the purpose of

participating in the commercial sex venture. The caretakers were allowed to live at the apartments and houses used as brothels. The caretakers were provided with cell phones by the leaders/organizers. The caretakers also profited financially from their participation in the commercial sex venture. The caretakers provided one half of their proceeds from the commercial sex venture to the leaders/organizers. Your Affiant states that during the course of this investigation, five (5) search warrants have been executed in Tulsa, Oklahoma City, and Kansas City.

III. The Indictments

A. On February 7, 2012 a Federal Grand Jury in the Northern District of Oklahoma returned an Indictment of Ignacio IJOM-Brito and Antonio Felix VELASQUEZ-Lopez for 18 USC 1591(a)(2) - Sex Trafficking by Force, Fraud, and Coercion and 18 USC 1594(a) and 2(a)- Conspiracy to Engage in Sex Trafficking by Force, Fraud, and Coercion.

B. On March 7, 2012 a Federal Grand Jury in the Northern District of Oklahoma returned the first Superseding Indictment of Ignacio IJOM-Brito, Antonio Felix VELASQUEZ-Lopez, Sermaias Samuel SANCHEZ-Ajin, Israel VELASQUEZ-Lopez, and FNU LNU aka: "Sor Angeles" for and 18 USC 1594(c), 1594(a), and 1594 2(a)- Conspiracy to Engage in Sex Trafficking by Force, Fraud, and Coercion; 18 USC 1591(a)(2) - Sex Trafficking by Force, Fraud, and Coercion; and 18 USC 2422(a) – Coercion and Enticement to Travel in Interstate Commerce to Engage in Prostitution.

C. On April 3, 2012 a Federal Grand Jury in the Northern District of Oklahoma returned the second Superseding Indictment of Ignacio IJOM-Brito, Antonio Felix VELASQUEZ-Lopez, Israel VELASQUEZ-Lopez, FNU LNU aka: "Sor Angeles," and Juan ROSALES-Garza for and 18 USC 1594(c), 1594(a), and 1594 2(a)- Conspiracy to Engage in Sex Trafficking by Force, Fraud, and Coercion; 18 USC 1594(d) – Criminal Forfeiture; 18 USC 1591(a)(2) - Sex Trafficking by Force, Fraud, and Coercion; and 18 USC 2422(a) – Coercion and Enticement to Travel in Interstate Commerce to Engage in Prostitution.

IV. Statements by Female Workers

A. AH (involuntary worker)

Your Affiant states that an involuntary worker identified as "AH" made contact with HSI agents in Houston, TX and notified them that she was being involuntarily transported to Tulsa, OK to perform commercial sex acts and was being held against her will. HSI agents executed a search warrant at an apartment in Tulsa OK and located AH on January 19, 2012.

Your Affiant states that AH stated to agents during interviews that she had been illegally smuggled into the United States from Mexico several years ago and had been forced to perform commercial sex acts under threats of harm to her family in Mexico. AH stated to Agents that she had been forced to perform commercial sex acts in over ten (10) states over a period of several years. AH stated that the man responsible for smuggling her into the United States and forcing her to begin working as a prostitute was "Saul Rojas" and that

he operated his commercial sex scheme out of Atlanta, Georgia. AH stated that Antonio Felix VELASQUEZ-Lopez forced her to perform commercial sex acts in Tulsa, OK.

B. BC (involuntary worker)

Your Affiant states that an involuntary worker identified as BC was located during the execution of a search warrant in Oklahoma City on January 26, 2012. BC stated to agents that she began working as a prostitute in Houston, TX and then was transported to Oklahoma City. BC stated to Agents that once in Oklahoma City, she stated to her caretakers that she wished to leave and return to Houston, and she was told that she could not leave. BC stated that she was not allowed to leave during the time she worked in Tulsa, Oklahoma City, and Kansas City. BC stated that she had performed commercial sex acts at two different locations in Tulsa, OK and identified photos of Israel VELASQUEZ-Ramirez and Sermaias Samuel SANCHEZ-Ajin as the caretakers of the two locations where BC had worked in Tulsa. BC stated that a woman named "Sor Angeles" was a leader/organizer that was in charge of the brothel ran by VELASQUEZ.

Your Affiant states that BC stated that a woman named DIANA and her husband, FERNANDO were leaders/organizers of a commercial sex act scheme operating multiple brothels in Kansas City and one brothel in Tulsa, OK. BC identified a photo of Juan ROSALES-Garza as FERNANDO. BC provided the phone number **956-626-5509** for DIANA and stated that FERNANDO uses phone numbers 913-444-0450 and 913-972-8385.

C. IA (voluntary worker)

Your Affiant states that a woman identified as a voluntary prostitute, "IA" was encountered during the execution of a search warrant in Tulsa, OK on January 25, 2012. IA stated that she was a voluntary prostitute in multiple states. IA stated that a man named FERNANDO and his wife DIANA were leaders/organizers of a multi-state prostitution/commercial sex scheme that operated brothels in Memphis, TN, Kansas City, and Tulsa, OK. IA stated that the phone number was saved in her phone as "Diana Fernando," and stated that FERNANDO and DIANA were a couple. Your Affiant identified the phone number **956-626-5509** saved as DIANA FERNANDO in IA's phone. IA stated that she called this number to engage in prostitution in Memphis, Tulsa, and Kansas City.

V. Statements by Co-Conspirators

A. Sermaias Samuel SANCHEZ-Ajin (aka: Luis SANCHEZ)

You Affiant states that on March 28, 2012, SANCHEZ entered a guilty plea to Count One of the First Superseding Indictment, that is, Conspiracy to Engage in Sex Trafficking by Force, Fraud, and Coercion. SANCHEZ admitted to operating a brothel as a caretaker in Tulsa, OK. SANCHEZ stated that he worked for a man named Juan ROSALES-Garza and his wife, a woman who goes by DIANA. SANCHEZ stated that he met Juan ROSALES-Garza and DIANA in Tulsa and they offered him a job operating a brothel in Tulsa. SANCHEZ stated that Juan ROSALES-Garza and DIANA operate a multi-state commercial sex scheme with locations in Memphis, TN, Tulsa, OK, Kansas City, KS, and somewhere in Florida. SANCHEZ identified photos of Juan ROSALES-Garza and Gloria GIAMMALVA as DIANA.

SANCHEZ identified the phone numbers 913-944-0450 and 913-972-8385 as numbers used by Juan ROSALES-Garza and 956-626-5509 as the number used by DIANA to operate their multi-state commercial sex / prostitution scheme.

SANCHEZ provided bank account numbers that he had used to wire money that was proceeds of commercial sex acts to ROSALES-Garza and DIANA. SANCHEZ provided the bank account numbers XXXXXXXX1856 (Bank of America) XXXXXXXX7513 and XXXXXXXX4444 (Bank of America) and stated that these accounts were owned by Juan ROSALES-Garza and DIANA.

SANCHEZ also stated that a woman named "Sor Angeles" was a leader/organizer of a commercial sex/prostitution scheme that used to be connected the ROSALES-Garza and DIANA but had separated and were no longer business partners.

B. Israel VELASQUEZ-Ramirez (aka: Marcos)

Your Affiant states that on April 11, 2012 VELASQUEZ entered a guilty plea to Count One of the First Superseding Indictment, that is, Conspiracy to Engage in Sex Trafficking by Force, Fraud, and Coercion. VELASQUEZ admitted to operating a brothel in Tulsa, OK as a caretaker and stated that a woman named "Sor Angeles" was the leader/organizer that he worked for.

VI. Gloria Giammalva (aka: Diana) and the Conspiracy

A. Relationship to Juan ROSALES-Garza (aka: Fernando)

Your Affiant states that checks in the US Citizenship and Immigration Services Central Index System (USCIS) database reveal that Gloria GIAMMALVA is a naturalized United States Citizen and that her country of birth is Columbia. USCIS checks also reveal that Juan ROSALES-Garza is a lawful permanent resident (LPR) and is classified as "IR1" which is the classification assigned to the spouse of a United States citizen. During interviews of ROSALES-Garza following his arrest, ROSALES-Garza stated to your Affiant that he obtained his LPR status by marrying Gloria GIAMMALVA.

Your Affiant states that he has established through the statements, as described in the preceding paragraphs in this affidavit, of co-conspirators, voluntary prostitutes, and involuntary workers that Juan ROSALES Garza (aka: Fernando) and Gloria GIAMMALVA (aka: Diana) are a married couple and are jointly operating a multi-state commercial sex/prostitution/sex trafficking criminal enterprise.

C. Phone Connectivity to Co-Conspirators

Your Affiant States that he has established through the course of this investigation that Gloria GIAMMALVA uses cell phones with the mobile numbers 956-626-5509 and 407-508-1753.

Your Affiant states that from November 29, 2011, and continuing to March 19, 2012, the number 956-626-5509, used by Gloria GIAMMALVA, had contact with Juan ROSALES-Garza as described below:

- 186 phone calls with the number **913-972-8385**; phone used by Juan ROSALES-Garza and found on his possession during his arrest
- 787 phone calls with the number **913-944-0450**; phone used by Juan ROSALES-Garza and found on his possession during his arrest

Your Affiant States that from December 15, 2011 to March 15, 2012, the number 407-508-1753, used by Gloria GIAMMALVA, had contact with the following as described below:

- 22 phone calls with the number **913-944-0450**; phone used by Juan ROSALES-Garza and found on his possession during his arrest
- 1 phone calls with the number **913-972-8385**; phone used by Juan ROSALES-Garza and found on his possession during his arrest

D. Financial Ties To and Profits From the Conspiracy

Your Affiant states that he has identified through the course of this investigation at least three (3) bank accounts from Bank of America into which Juan ROSALES-Garza and Gloria GIAMMALVA instructed co-conspirators to deposit proceeds derived from the commercial sex trafficking conspiracy. Your Affiant states that these bank account numbers were written on documents seized from Semiais Samuel SANCHEZ-Ajin.

Your Affiant states that bank account activity was received for these three accounts via Grand Jury subpoena. Your affiant states that the bank records for all three accounts show that frequent cash deposits were made into the accounts

at Bank of America locations in Memphis, TN, Kansas City, KS, Tulsa, OK and Kissimmee, FL. Your Affiant states that the bank records also show that there were frequent cash withdrawals from all three bank accounts in Kissimmee, FL, which is where Juan ROSALES-Garza and Gloria GIAMMALVA reside. Your Affiant states that the cash withdrawals frequently are similar or exact amounts of the cash deposits made in Memphis, TN, Kansas City, KS, Tulsa, OK and Kissimmee, FL. Your Affiant states that from in or about December 2008 to March 2012 the total deposits made into all three accounts combined was over approximately \$290,000.

VII. Conclusion

The information in this affidavit is based on my investigation, my observations, statements made by victims, witnesses, and defendants, and on information provided by other law enforcement officers. I have set forth the facts that I believe are necessary to establish probable cause to believe that GLORIA N. GIAMMALVA AKA: DIANA has violated Title 18, United States Code, Sections 1591(a) and 2(a), Title 18, United States Code, Section 1594(c), and Title 18, United States Code, Section 2422.

Further Your Affiant sayeth not.



Garrett D. Hendrickson
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me on this 26th day of April, 2012.



T. LANE WILSON
United States Magistrate Judge